

Modifications of Amateur Radio Service Rules and Regulations
to allow encryption on Amateur Radio Service Frequencies
RM-11699

Federal Communications Commission
445 12th St SW
Washington, DC 20536

I respectfully oppose this suggested modification to 47 CFR Part 97. The proposal is not in keeping with the long-standing tenets of the Amateur Radio Service. If this modification is allowed it will cause irreparable damage to the service.

On the surface, this suggestion allows members of the Amateur Radio Service to expand the services it provides to its stakeholders. However, Part 97 clearly provides in 47 CFR 97.113 Prohibited Transmissions: “(5) Communications, on a regular basis, which could reasonably be furnished alternatively through other radio services. While one may argue on the regular basis provision the use of AES, DES or other encryption methods will be used on a regular basis during exercises and repetitive emergencies or disasters such as hurricanes, tornadoes or other tropical storms. Other radio services are available that allow encryption.

If our stakeholders cannot accept the limitations of our radio service, they need to employ another radio service that will allow them to encrypt their radio transmissions. This proposal if implemented will only open the door further to users of our frequencies who refuse to follow the rules. They will be able to conduct business on the ham bands be the business legitimate or illegal. This proposal will restrict if not impede the operations of the FCC Auxiliary or OO program. We have amateur radio operators who openly flaunt violation of the rules who will no longer be accountable for their actions. Conceivably it could take law enforcement agencies days if not weeks to copy the traffic being encrypted. If the user changes their code regularly, it may be next to impossible to determine what activities licensed or unlicensed operators are doing on amateur frequencies. Furthermore, encryption in what needs to be an interoperable environment is a disaster in itself. If the user of an encrypted radio allows it to be used with bridging equipment the purpose of the encryption will be compromised.

Allowing encrypted radio signals on Amateur Radio Service frequencies is not a good idea and must not be approved for incorporation in 47 CFR Part 97.

Respectfully,

/s/ Monte L. Simpson

Monte L. Simpson, K2MLS